

**IN THE UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF TEXAS
HOUSTON DIVISION**

T-M VACUUM PRODUCTS, INC.
Plaintiff

V.

**TAISC, INC. d/b/a GLOBALEASE
SOLUTIONS**
Defendant

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CIVIL ACTION NO.07-4108
JURY

DEFENDANT'S NOTICE OF INITIAL DISCLOSURES

TO THE HONORABLE U. S. DISTRICT JUDGE:

Defendant, **TAISC, INC. d/b/a GLOBALEASE SOLUTIONS**, submits its Notice of Initial Disclosures, and would respectfully show the Court as follows:

I.

Today, Defendant served its Initial Disclosures to Plaintiff in accordance with the local rules and Federal Rules of Civil Procedure. Defendant will continue to supplement as circumstances permit and as required by the governing rules.

WHEREFORE, PREMISES CONSIDERED, Defendant prays that the Court take notice of such disclosures, and for such other and further relief to which Defendant may be entitled.

Respectfully submitted,

Of counsel
BOUSQUET & DEVINE, P.C.

_____/s/ Thomas G. Bousquet_____
THOMAS G. BOUSQUET
9225 Katy Freeway, Suite 103
Houston, Texas 77024
Federal Admissions No. 3285

Bar Card No. 02717000
713-827-8000
713-827-0096 (fax)
ATTORNEY FOR DEFENDANT

CERTIFICATE OF SERVICE

I certify that a true copy of the above was served on each attorney of record or party in accordance with the Federal Rules of Civil Procedure on __March 7__, 2008.

____/s/ Thomas G. Bousquet_____
THOMAS G. BOUSQUET

**IN THE UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF TEXAS
HOUSTON DIVISION**

T-M VACUUM PRODUCTS, INC.
Plaintiff

V.

**TAISC, INC. d/b/a GLOBALEASE
SOLUTIONS**
Defendant

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CIVIL ACTION NO.07-4108
JURY

DEFENDANT'S INITIAL DISCLOSURES UNDER FRCP 26

TO THE HONORABLE U. S. DISTRICT JUDGE:

Defendant, **TAISC, INC. d/b/a GLOBALEASE SOLUTIONS**, submits its Initial Disclosures, and would respectfully show the Court as follows:

I

Each individual likely to have relevant discoverable information known to defendant are:

- a) T-M Vacuum personnel, including
Fred T. Stuffer, President
Ted Lotz, International Sales Manager
Rennie Wessner, Vice President
Jim Palombo, Regional Sales Manager
Kenneth Schneider
T-M Vacuum Products, Inc.
630 S. Warrington St.
PO Box 2248
Cinnaminson, NJ 08077
856-892-2000
- b) GlobaLease Solutions personnel, including
John B. Berry
TAISC, Inc. d/b/a GlobaLease Solutions
1330 Post Oak Blvd., Ste 1600
Houston, TX 77056

800-749-3905

- c) Ulba personnel, including
H. P. Mycnh
S. Dobrussin
V. Shevlyakov
V. Kuznetzov
N. R. Mussin, General Director
A. Gagarin, Chief Engineer
V. Dorohov, Purchase Manager
S. Zemlyak, Head of Legal Department
Ulba Metallurgical Plant Joint Stock Company
102 Abay Ave.
070005 Ust-Kamenogorsk
Republic of Kazakhstan
3232-29-84-43
- d) Jim Palombo, Regional Sales Manager
Sheila Giordano, Project Manager
Plansee USA, LLC
f/k/a Schwarzkopf Technologies
115 Constitution Blvd.
Franklin, MA 02038
508-553-3800
- e) Yury Malykh
Sergei Rusch
SR Systematics Group GmbH
Rindermarkt 6, 80331 München
49(0)8926018067

II.

All documents in the possession of Defendant have been furnished to Plaintiff with the pleadings, or in three, three-ring binders plus a bound volume, which have been produced in response to a Request for Production.

III.

A computation of Defendant's damages claimed by Defendant is attached hereto as Exhibit

“A”. All back up materials are in Plaintiff’s possession.

IV.

Defendant has no insurance which could settle any judgment herein.

V.

Defendant has no known expert witness in mind except Thomas G. Bousquet, who will testify as to reasonable and necessary attorneys fee’s incurred herein and on appeal.

It is not known who might only testify by deposition.

Respectfully Submitted,

BOUSQUET & DEVINE, P.C.
Of Counsel

/s/ Thomas G. Bousquet
THOMAS G. BOUSQUET
ATTORNEY AT LAW
Federal Court No. 3285
State Bar # 02717000
9225 Katy Freeway #103
Houston, Texas 77024
(713) 827-8000
(713) 827-0096 (fax)
ATTORNEY FOR DEFENDANT

CERTIFICATE OF SERVICE

I HEREBY CERTIFY that a true and correct copy of the above instrument has been served, pursuant to Federal Court Rules, by First Class U.S. Mail, postage prepaid and properly addressed, all as shown by the attached Service List, on this 7h day of March, 2008.

H. Miles Cohn
Sheiness, Scott, Grossman & Cohn
1001 McKinney, Suite 1400
Houston, TX 77002

/s/ Thomas G. Bousquet

THOMAS G. BOUSQUET

EXHIBIT "A"

- a) "Vendor shall immediately repay upon demand all previously received Conditional Payments to Lessor if such default continues uncured for a period of more than fifteen days.

Such repayment shall be with interest calculated at one per cent per month from the date such Conditional Payment was delivered to Vendor as if such Conditional Payments were originally a loan to Vendor."

\$439,577.80

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|----|-----------------------------------|-----------|
| b) | Contractual late shipment penalty | 87,532.00 |
| c) | Attorney's fees to date | 50,000.00 |
| d) | Interest through date of payment | Unknown |